

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA  
READING DIVISION**

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**In re:**

**MARTIN J. FRANKENFIELD, III,  
  
Debtor**

**Chapter 13 Bankruptcy**

**Bankruptcy No. 16-12915 PMM**

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**NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE**

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**To: The Debtor, the Chapter 13 Trustee, the United States Trustee and all Creditors:**

**Movant, the Debtor in this bankruptcy proceeding, has filed a Motion to Modify Plan Post-Confirmation Pursuant to 11 U.S.C. 1329.**

**YOUR RIGHTS MAY BE AFFECTED. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney).**

**1. If you do not want the Court to grant the relief sought in the motion or if you want the Court to consider your views on the motion, then on or before November 30, 2020 you or your attorney must do all of the following:**

**(a) file an answer explaining your position at The United States Bankruptcy Court, Office of the Clerk, The Gateway Building, Room 103, 201 Penn Street, Reading, PA 19601. If you mail your answer to the Bankruptcy Clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and**

**(b) mail a copy to the Movant's attorney at:**

**George M. Lutz, Esquire  
Hartman, Valeriano, Magovern & Lutz, PC  
1025 Berkshire Boulevard, Suite 700  
P.O. Box 5828  
Wyomissing, PA 19610**

**2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the Court may enter an order granting the relief requested in the motion.**

**3. A hearing on the motion is scheduled to be held before the Honorable M on December 3, 2020 at 11:00 a.m. in the 4<sup>th</sup> Floor Courtroom, United States Bankruptcy Court, The Gateway Building, Room 103, 201 Penn Street, Reading, PA 19601.**

**4. A copy of the proposed Motion to Modify Plan is attached. If a copy of the motion is not attached, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b), whose phone number is 610-779-0772.**

**5. You may contact the Bankruptcy Clerk's office at 610-208-5040 to find out whether the hearing has been canceled because no one has filed an answer.**

**Dated:** November 5, 2020